

1 BY MR. JAUREGUI:

2 Q. In the '90s.

3 A. I don't --

4 I wouldn't believe that we would have
5 any document about a specific order from the
6 mid '90s. We wouldn't keep that for any reason --

7 Q. All right.

8 A. -- beyond standard, you know, number of
9 years after the order.

10 Q. What about today, do you know if that
11 data is kept today by Hunter Douglas, if a consumer
12 requests different cord lengths than those vertical
13 blinds would come with?

14 A. I don't know off the top of my head what
15 the retention policy is for different types of
16 documents, so I don't know how far back an order
17 would be kept -- maintained on a computer system.

18 Q. All right. To your knowledge in the
19 mid '90s, '94, '95, '96, do you know if
20 Hunter Douglas maintained any data containing the
21 information for consumers such as the name of the
22 consumer, the purchaser's address and a telephone
23 number?

24 A. If that --

25 If a retail dealer was dealing with an

1 independent fabricator, then none of that
2 information would be held by Hunter Douglas.

3 Q. And if the retailer or dealer was
4 dealing with a nonindependent fabricator?

5 A. If they were dealing with a
6 Hunter Douglas-owned company, then there might be
7 information regarding to an individual consumer,
8 but typically very vague.

9 Q. And when you say "typically very vague,"
10 what do you mean?

11 A. There would be --

12 Most common practice is to put what's
13 called a mark for. So if the order came from
14 Bob's Blind retail store, it may be that there
15 would be a side mark on the order so that when it
16 was delivered to the retailer it's for, you know,
17 the Smith family.

18 Q. Do you have any sense in the mid '90s of
19 whether Hunter Douglas had any Hunter Douglas-owned
20 facilities in the Chicago area?

21 A. In the mid '90s I don't believe we did.

22 Q. Now, the blind at issue was purchased --

23 MR. WILLIAMS: Do you need a short
24 break or are you okay?

25 MR. JAUREGUI: No, I'm okay. I just

1 remove them from the chain or the cord?

2 A. To my recollection that hang tag was
3 designed to be removed, it was not intended to be a
4 permanent, you know, document hanging from the
5 shade.

6 Q. Mr. Rubinoff, what is your --

7 The last position that we discussed was
8 general manager.

9 A. The last one I think we got to was
10 vice president and general manager of --

11 Q. VP, I'm sorry, I did not mean to --

12 A. -- Hunter Douglas.

13 Q. VP and general manager.

14 A. Of Hunter Douglas Window Décor I think
15 we got to. I'm not sure where we ended up.

16 Q. All right. Thanks.

17 Now, what is the --

18 Is this a separate division, Window
19 Décor, Hunter Douglas Window Décor?

20 A. We changed the name of
21 Hunter Douglas Verticals to Hunter Douglas Window
22 Décor Division sometime in the, I don't know, late
23 '90s, 2000 maybe.

24 Q. Let me go back for a second to the issue
25 of labels and warnings.